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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

RENATO CONSUEGRA-CLEMENTE,

Defendant.

Case No.: 2:20-cr-00018-JCM-EJY

**GOVERNMENT'S DISCLOSURE  
STATEMENT**

Pursuant to LCR 16-1(b)(2) of the Local Rules of Practice for the District of Nevada, Allison Reese, Assistant United States Attorney, contacted Paul Riddle, Assistant Federal Public Defender, counsel for defendant RENATO CONSUEGRA-CLEMENTE, to discuss scheduling of discovery in the instant case. **The Government has provided this Government Disclosure Statement to defense counsel and is moving forward with providing discovery in this matter.** The Government agrees to provide discovery in the instant case as follows:

**Discovery Schedule**

A. The Government has provided or will provide or permit the defendant to inspect and copy or photograph:

1           1) All statements, documents, and objects, including audio or video  
2           recordings, required to be disclosed under Rules 16(a)(1)(A)-(F),  
3           Federal Rules of Criminal Procedure.

4           2) All search warrants and supporting affidavits, which relate to evidence  
5           that may be offered at trial.

6           3) The Government will provide expert disclosures as required under Rule  
7           16(a)(1)(G), Federal Rules of Criminal Procedure.

8 B. The Government is unaware of any exculpatory information. The Government will  
9       provide as soon as reasonably possible any exculpatory information of which it is  
10      aware. The Government will provide any subsequently discovered exculpatory  
11      information reasonably promptly upon its discovery. The Government will provide  
12      impeachment information relating to government witnesses who will testify at a pre-  
13      trial hearing, trial or sentencing sufficiently in advance of the hearing, trial or  
14      sentencing to allow the hearing, trial or sentencing to proceed efficiently.

15 C. The Government hereby makes any and all demands for reciprocal disclosures from  
16      the defendant under Federal Rules of Criminal Procedure 12.1, 12.2, 12.3 and 16,  
17      including but not limited to the following, to be provided prior to trial:

18           1) All documents, objects, and reports of examination required under  
19           Rules 16(b)(1)(A) and (B), Federal Rules of Criminal Procedure.

20           2) All expert disclosures as required under Rule 16(b)(1)(C), Federal  
21           Rules of Criminal Procedure.

22           3) All notices of any defenses under Rule 12.1, Federal Rules of Criminal  
23           Procedure.

- 1           4) Any summaries, charts, or calculations, which the defense intends to  
2           offer at trial.

3 D. The Government will no later than 5 days before trial or at such subsequent time as  
4 the Government learns any of the following information:

- 5           1) Disclose any summaries, charts, or calculations, which the  
6           Government intends to offer at trial.

- 7           2) Identify recordings, transcripts of recordings, or portions thereof,  
8           which the Government intends to offer at trial.

- 9           3) Disclose any reports or memoranda of interviews of witnesses the  
10          government intends to call in its case in chief.

- 11          4) Disclose any statements of witnesses under Title 18, United States  
12          Code, Section 3500.

13 E. If the Government withholds the disclosure of items subject to discovery under  
14 Federal Rule of Criminal Procedure 16 or case law or statute, it will either: 1) provide  
15 notice to the defense of its intent to withhold disclosure and describe the nature of the  
16 item and the basis for withholding disclosure; or 2) submit in camera a motion to the  
17 court for a protective order describing the nature of the item, the basis for withholding  
18 disclosure and the need for in camera review and any sealing of the record. The  
19 Government requests that, if the defendant withholds the disclosure of any such  
20 item(s), it provide such notice to the Government.

21 The disclosures and reciprocal disclosures set forth above apply to those objects,  
22 documents, items, and other disclosure matters that are in the possession, custody, or control  
23 of the parties at the time the obligation to disclose arises. The Government recognizes that  
24 it has a continuing duty to provide disclosures up to and through trial as to any matters

1 required to be disclosed by statute, rule, or the United States Constitution. Nothing in this  
2 statement is intended to create any rights for the defendant or in any way restrict or expand  
3 the remedies available to the Court for any breach of any disclosure obligations.

4 The Government holds itself available to make good faith efforts to confer with  
5 defense counsel to resolve informally any dispute over the scope, manner and method of  
6 disclosures before seeking relief from the Court.

7 DATED: February 27, 2020

8 NICHOLAS A. TRUTANICH  
9 United States Attorney

10 */s/ Allison Reese*

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12 ALLISON REESE  
13 Assistant United States Attorney  
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